

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter of)
)
Telecommunications Relay Services and)
Speech-to-Speech Services for) CG Docket No. 03-123
Individuals with Hearing and Speech)
Disabilities)
_____)

REPLY COMMENTS
OF
SONNY ACCESS CONSULTING.
ON ASSIGNING INTERNET PROTOCOL-BASED
TELECOMMUNICATIONS RELAY SERVICE USERS
TEN-DIGIT TELEPHONE NUMBERS LINKED TO THE
NORTH AMERICAN NUMBERING PLAN

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The Federal Communications Commission is to be applauded for recognizing the need to have ten-digit numbers (TN) registered for videophones and giving the public the opportunity to share comments.

Introduction:

I was the executive director of Telecommunications for the Deaf, Inc. (TDI) from 1987 to 1996. As indicated in “A New Civil Right” by Karen Peltz-Strauss, during my tenure, the FCC developed awareness of the needs of people with hearing disabilities and created the Disability Rights Office. As a retired deaf father and grandfather of deaf children and grandchildren with absolutely no obligations with the industry, I am submitting my unbiased reply to the comments submitted.

Background:

During my tenure with TDI, we legislated for equal access to both 9-1-1 services in Title 2 of the ADA and relay services in Title 4 of the ADA. Also TDI assisted the Dept of Justice in developing effective guidelines on emergency-related TTY calls and the FCC in developing effective regulations on TRS. In addition, we inserted some language in the Telecommunications Act of 1996, stating that service providers shall not be manufacturers. As a result, all TTYs, 9-1-1 networks and TRS were both interconnectable and interoperable without any complications or restrictions.

Since one manufacturer of a videophone entered the relay service arena as a video relay service (VRS) provider about five years ago, restrictions were implemented with a main goal to maximize the generation of revenues from the TRS Interstate Fund. Such restrictions enhanced segregation rather than integration of people with and without hearing disabilities.

Questions:

Based on what had happened in the past few years, some questions should be looked into before a decision is made. Questions are as follows:

1. Who are the current and potential videophone users? Only people with hearing disabilities? How about hearing people such as soldiers in Iraq and Afghanistan communicating with their families at home? Hearing parents of deaf children? Hearing siblings? Hearing children of deaf parents? Hearing people with hearing people?
2. What is videophone? It is similar to voice phone but with a video screen and uses Internet. It is being used to connect with another videophone. Like

voice phones, cell phones and TTYs, its main purpose is to be interconnected with any videophone, not only with VRS.

3. What is Video Relay Service? It is a visual interpreting service which happens to rely on videophones.
4. What are possible services using videophones other than VRS? Distance medicine by hearing people. Teleconferences of various classes, seminars, and workshops, to name a few.
5. Should TN be distributed and monitored by VRS providers? If so, should VRS providers be involved in distributing and monitoring TN for non-VRS users?
6. Since current ruling states that VRS provides services for ASL users, will VRS providers, if they are to distribute and monitor TN, be consistent in providing TN to users with hearing disabilities who are not ASL users?
7. Should each VRS provider be authorized to provide TN, will this deprive consumers from having a single TN per household for several videophones from different providers and manufacturers?
7. Based on what had happened when a VRS provider used its product to manipulate the system at the expense of consumers and common carriers, will VRS providers create more restrictions should they be authorized to distribute and monitor TN?
8. Will the FCC have full jurisdiction to oversee and enforce the distribution of TN even though VP is IP based? :

Recommendations:

To minimize segregation and enhance integration of all Americans, may they be with or without disabilities, it is strongly recommended that an independent organization be created to distribute TN for every videophone. Operation costs of this organization may be covered by all end users.

Enhance integration, not segregation.

Respectfully submitted.,

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